



**Liberty  
Mutual**

US EPA RECORDS CENTER REGION 5



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June 15, 2011

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mike R. Rafati, Enforcement Specialist  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 W. Jackson Boulevard  
SR-5J  
Chicago, IL 60604-3590

**Re: EPA's Request to Liberty Mutual Insurance Company for Information Pursuant  
to Section 104(e) of CERCLA regarding Chemetco facility in Hartford, IL**

Dear Mr. Rafati:

In connection with Liberty Mutual Insurance Company's ("Liberty Mutual") response to the EPA's 104(e) Request for Information regarding the Chemetco facility in Hartford, Madison County, Illinois ("Site") dated June 10, 2011, I am forwarding additional information for your review. Liberty Mutual reserves the right to supplement the initial response should it come to our attention that additional responsive documents are located.

The General Objections listed in the June 10, 2011 letter are incorporated in this response as well. As a reminder, Liberty Mutual objects to the disclosure of information that is deemed Confidential or Proprietary Information or a Trade Secret. Liberty Mutual objects to the requests to the extent that they seek information that is confidential or proprietary or a trade secret and will assert a confidentiality claim under 42 U.S.C. Section 9604(e) (7) and related statutes and regulations.

This supplement contains proprietary trade secret information pertaining to policy information not disclosed to third parties. Liberty Mutual has safeguards in place to protect company confidential, trade secret and proprietary information and individual policyholder information because disclosure of such information to the public could adversely affect Liberty Mutual's business and claims handling practices and the policyholder.

The confidentiality of the submission is continuing and not limited in time. Liberty Mutual requests the EPA to return this confidential information upon the conclusion of its investigation. The originals should be returned to me at the address specified at the top of this page of the letter. For your convenience, a return label has been provided with our response. To the extent any contents of the submission have been scanned and stored

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electronically, appropriate steps should be taken to ensure the electronic versions of this have been deleted. If any copies of the documents have been made, those copies should be returned to my attention as well.

Liberty Mutual has not disclosed this information to any other entity or party not involved in this 104e request.

As you will note, Liberty Mutual has submitted the documents in an appropriately labeled envelope. I look forward to hearing from you concerning the verification of the confidentiality claim.

Pursuant to our responses to request numbers 3 and 4 in our June 10<sup>th</sup> response, we are submitting copies of the following policies issued to:

Chemetco, Inc.  
P.O. Box 67  
Hartford, IL 62048

Garage Coverage Form

(10/1/1997 - 1998)

(10/1/1998 - 1999)

(10/1/1999 - 2000)

Truckers Declarations

(10/1/1997 - 1998)

(10/1/1998 - 1999)

(10/1/1999 - 2000)

Please note that we consider the enclosed insurance policies to be confidential. They may be disseminated to the insured named in the policies, but should not be disseminated to the public without the insured's consent.

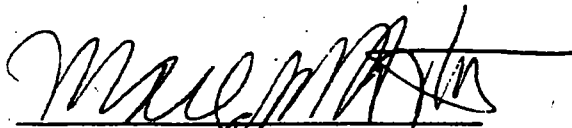
Underwriting files pertaining to the above-referenced policies will be made available to you for inspection in our offices in Boston, Massachusetts at a mutually agreed upon date and time.

We will advise you if we locate any additional policies responsive to the requests dated May 4, 2011.

## DECLARATION

I certify under a penalty of law that this document and all Enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted and the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Executed on June 15, 2011



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Enclosures